

RESPONSE: A substantial part of the events or omissions giving rise to the claims in the Complaint occurred in this division. Plaintiffs' claims are asserted in the Charleston Division because Plaintiffs reside in this Division, Plaintiffs' claims arose in this Division, and Defendant transacts business and contracted to supply goods in this Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No, not related to any other matter.

Dated: August 29, 2017

Respectfully submitted,

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**pro hac vice application forthcoming*